

UNITED STATES DISTRICT COURT

for the
Eastern District of Missouri

In the Matter of the Search of)
Information associated with Facebook user ID,)
100001557613612 that is stored at premises controlled by) Case No. 4:22 MJ 1071 (JMB)
Facebook, Inc. This user account is affiliated with an)
account located within Facebook, Inc., an Internet-based) SUBMITTED TO THE COURT AND
social networking site headquartered in Menlo Park,) SIGNED BY RELIABLE ELECTRONIC MEANS
California.)

APPLICATION FOR A SEARCH WARRANT

I, ANGELA CANDLER-BRUNO, a federal law enforcement officer or an attorney for the government request a search warrant and state under penalty of perjury that I have reason to believe that on the following property:

SEE ATTACHMENT A

located in the NORTHERN District of CALIFORNIA, there is now concealed

SEE ATTACHMENT B

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

Title 21, U.S.C., §§ 846, 841(a)(1)

Conspiracy to possess with intent to distribute controlled substance(s)

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


I state under the penalty of perjury that the foregoing is true and correct.

Angela Candler-Bruno
Angela Candler-Bruno, Task Force Officer
Drug Enforcement Administration
Printed name and title

Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41.

Date: February 24, 2022

City and State: St. Louis, MO


Judge's signature
John M. Bodenhausen, U.S. Magistrate Judge
Printed name and title
AUSA: STEPHEN CASEY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

IN THE MATTER OF THE SEARCH OF
INFORMATION ASSOCIATED WITH
FACEBOOK USER ID (100001557613612)
THAT IS STORED AT PREMISES
CONTROLLED BY FACEBOOK INC.

Case No. 4:21 MJ 1071 (JMB)

Filed Under Seal
SUBMITTED TO THE COURT AND
SIGNED BY RELIABLE ELECTRONIC
MEANS

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Angela Candler-Bruno being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with a certain Facebook user ID that is stored at premises owned, maintained, controlled, or operated by Facebook Inc. (“Facebook”), a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the user ID.

2. I am a Task Force Officer (TFO) with the United States Drug Enforcement Administration (“DEA”), and have been since May 2020. As such, I am a law enforcement officer of the United States within the meaning of Title 18 U.S.C. Section 2510(7), and I am empowered by law to conduct investigations and to make arrests for criminal offenses, to include those enumerated in Title 18 U.S.C. Section 2516. From April 1996 to September 1996, I received approximately 6 months of police training at the St. Louis County and Municipal Police Academy. From September 1996 to approximately August 1999 I was assigned to the North

County Precinct assigned to the Division of Patrol. From August 1999 to March 2002 I was assigned to the Affton Southwest Precinct as a Neighborhood Policing Officer assigned to the Division of Patrol. From March 2002 to October 2005 I was assigned to the Highway Safety Unit. From October 2005 to April 2006 I was assigned to the Domestic Violence Unit as a detective in the Division of Criminal Investigations. From April 2006 to March 2011 I was assigned to the Child Abuse as a detective in the Division of Criminal Investigations. From March 2011 to April 2012 I was assigned to the Division of Patrol and assigned to the City of Fenton Detail. From April 2012 to May 2020 I was assigned to the Division of Human Resources as a Background Investigator. From May 2020 to present date I was assigned to the DEA St. Louis Field Division. My experience as a Task Force Officer includes, but is not limited to, conducting surveillance, interviewing witnesses, debriefing defendants, writing affidavits for and executing search warrants, and working with undercover agents and informants. I have received training in and have experience in the investigation of violations of the federal drug and money laundering laws, including the offenses listed below. I have participated in the investigation of numerous drug trafficking conspiracies. As a result, I am, and agents assisting in this investigation are, familiar with matters including, but not limited to, the means and methods used by persons and drug trafficking organizations (“DTOs”) to purchase, transport, store, and distribute illegal drugs and to hide profits generated from those transactions. I also have experience in analyzing and interpreting drug codes and cryptic dialogue used by drug traffickers.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended

to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 21, United States Code, Sections 841(a)(1) and 846 have been committed by Jeffrey Swanson, Andrew Moore and other co-conspirators involved in the distribution of illegal drugs, specifically anabolic steroids. There is also probable cause to search the information described in Attachment A for evidence of these crimes and contraband or fruits of these crimes, as described in Attachment B.

PROBABLE CAUSE

Background

5. In November 2018, I and my team received information from a confidential source¹ (“CS”) that Brian Taylor and Jeff Swanson were distributing anabolic steroids from Enhanced Athlete’s Penthouse - Muscle Gen Militia (MGM) Facebook Group Page and Facebook Messenger.

6. Eventually, Swanson deactivated his original Facebook page and then shortly after activated the Facebook page “Jeff Boyardee” (Facebook User ID: 100029291990326).

7. In June 2019, agents learned Swanson began working with Andrew Moore. Agents have conducted several CS controlled purchases of steroids with Moore and have observed Jessica Moore. On some occasions the CS has placed orders for steroids with Moore through the “Drew Harris” Facebook page. Based on CS information and the CS’ controlled purchases, we have learned that Moore and his customers use the coded language “shirts” or “t-

¹ The CS’s information has been corroborated by controlling agents and has remained reliable to agents. The CS deactivated in June 2021 and is providing information to agents as a source of information (SOI). However, for clarity, the CS/SOI will be referred to herein as “CS” despite the change in status.

shirts” when ordering HGH to thwart law enforcement. Additionally, the CS stated Facebook monitors the language used online, therefore, Swanson and Moore have directed their customers to use certain coded language.

8. On October 2, 2019, DEA agents and officers conducted a controlled purchase of steroids and testosterone from Moore to an undercover officer. Among other things, Moore told the undercover officer that he and Swanson are “50/50 partners;” however, Moore profits approximately \$5,000 more than Swanson. Moore stated Swanson’s customers are starting to come to Moore for their orders because Moore responds to the customers. Moore stated he has approximately “100 vials of everything on hand like at any given time.” Moore stated he purchases approximately one kilogram of raw product at a time which produces 400 vials and profits approximately \$40,000 to \$50,000 a month in sales.

9. Agents collected additional evidence of Facebook posts and messaging with the CS showing Moore and Swanson utilizing their Facebook pages and a group page they controlled called “SP online” to conduct steroid sales. In those posts and messaging, Moore and Swanson utilized the code “shirts” or “t-shirts” to reference steroids.

Facebook Search Warrants

10. Based on the investigation to that point, on November 12, 2019, United States Magistrate Judge John M. Bodenhausen in the Eastern District of Missouri signed a federal search warrant for the following Facebook User ID’s – 100029291990326 (Jeff Boyardee) used by Jeffrey Swanson, 100022649417401 (Drew Harris) used by Andrew Moore and 319476455392042 (SP Online).

11. On May 5, 2020, United States Magistrate Judge Nannette A. Baker in the Eastern District of Missouri signed a federal search warrant for the following Facebook accounts --

100029291990326 (Jeff Boyardee) used by Jeffrey Swanson, 100022649417401 (Drew Harris) used by Andrew Moore, 319476455392042 (SP Online), and 100014125579436 used by Jason ZHENG (Wei ZHENG).

12. Based on a review of the information obtained through the warrants compared to Western Union financial records, agents fully identified Jason Zheng as Wei Zheng, located in China, and Fernando Lopez-Reyes² who assisted Zheng with the distribution of steroids in the United States. Agents also learned that Swanson and Moore were continuing to utilize Facebook to further their drug trafficking activities.

13. The search warrants and CS information revealed that Swanson began working with David Underwood to assist with the illegal proceeds, manufacturing, and distribution of illegal anabolic steroids.

14. The search warrants also revealed customers utilized SP online to place anabolic steroids orders with Moore and Swanson, posted photographs of customer's progress while using the anabolic steroids, and wrote reviews of how the product was working for them. Swanson continues to use this technique to further his illegal anabolic steroid distribution network, using a Facebook group page called "LLL online" and the Jeff Boyardee Facebook profile.

2020 Controlled Call with Swanson

15. On July 8, 2020, Swanson placed a phone call through Facebook Messenger to the CS. This phone call was recorded. During that call, the CS told Swanson that the CS wanted to stick with Swanson and asked Swanson how to contact Swanson for "t-shirts" (anabolic steroids). Swanson stated the CS should contact him through Facebook like normal. Swanson

² Fernando LOPEZ-Reyes has since been arrested by the DEA Omaha Office regarding the distribution of illegal anabolic steroids.

later stated Swanson and Moore “squared up financially” then Swanson kicked Moore out in April. Swanson stated he started selling in 2015 and was managing a GNC and knew people who wanted to buy and wanted to sell (anabolic steroids) and that is how Swanson got a foot in the door. Swanson stated he “would be shocked if it were not at least 1000 people he has dealt with.”

Identification of Lay Low Labs

16. On July 6, 2020, agents interviewed Chad Booher, who was previously identified as an anabolic steroid customer of Swanson’s. During the interview, Booher stated he receives his steroids from a guy named Jeff (Booher did not know his last name). Booher stated he met Jeff through a mutual friend who is now deceased. Booher stated he places orders with Jeff through e-mail and provided Jeff’s e-mail address as MuscleGenMilitia@protonmail.com. Booher said he originally paid Jeff through Venmo (a money transaction application) but has since switched to cash in the mail. Booher advised the steroid product sold by Jeff “looked like he got it from the doctor.” Booher stated the most he has sent to Jeff was approximately \$400 to \$500 and purchases approximately twice a month. Booher stated Jeff provided a list of the products being sold.

17. Agents asked Booher if he had any steroids currently at his residence. Booher stated he believed he had a vial of Testosterone in his room. Agents followed Booher to his residence where Booher turned over one vial of Test E 250 labeled “SP Pharma” and one vial of Test E 250 labeled “Lay Low Labs.”

18. Based on the information obtained through Booher’s interview and seizure, I believe Swanson had provided Booher with his prior anabolic steroid label of “SP Pharma” and had since began manufacturing his new anabolic steroid brand of Lay Low Labs.

2020 Undercover Buy from Swanson

19. On September 28, 2020, the CS contacted Swanson via Facebook Messenger to confirm Swanson had received an anabolic steroid order from an undercover officer. Swanson told the CS that Swanson uses “cash in the mail or bitcoin” and to use the e-mail: LLLPHARMA@protonmail.com to place orders. Based on this information, on September 28, 2020, an undercover officer e-mailed Swanson at LLLPHARMA@protonmail.com to purchase anabolic steroids. During the negotiation of the purchase, Swanson directed the undercover officer to send \$2,100.00 to “Jeff” at PO Box 141, Monmouth, IL 61462 as payment for the steroids. The undercover officer provided Swanson an undercover address, controlled by agents, to send the anabolic steroids.

20. On September 29, 2020, agents sent \$2,100.00 to “Jeff” at PO Box 141, Monmouth, IL 61462. The undercover officer advised SWANSON through LLLPHARMA@protonmail.com that the undercover officer had sent the money and to advise of the USPS tracking number when the anabolic steroids were shipped.

21. On October 1, 2020, agents established surveillance at the Monmouth United States Post office located at 235 S. 1st St., Monmouth, IL 61462 and David Underwood’s residence located at 503 W. 2nd Avenue, Monmouth, IL 61462. On the same day, I spoke with the Postmaster at the Monmouth United States Post Office regarding PO Box 141, Monmouth, IL 61462 registered to David Underwood and “Jeff Boyardee” (Jeffrey Swanson). I provided a driver’s license photograph to the Postmaster who positively identified Underwood as being the individual who acquired the U.S. postal parcel tracking #EJ43 2390 365 US (containing \$2,100 official advanced funds). The Postmaster stated Underwood had to sign for the parcel and provided a copy of the Product Tracking & Reporting document containing Underwood’s

signature. The Postmaster also provided the USPS photograph labels of the USPS parcel containing tracking #EJ43 2390 365 US. The Postmaster advised me that Underwood is the only individual allowed to acquire packages from PO Box 141, Monmouth, IL 61462.

22. On October 1, 2020, I and other agents observed Underwood arrive and enter the post office. Shortly after, we observed Underwood leave the post office where we surveilled him to the residence at 503 W. 2nd Avenue, Monmouth, IL 61462. I observed Underwood carrying United States currency while entering the residence.

23. Swanson did not provide the tracking numbers to the undercover officer prior the above mentioned undercover purchase; however, on October 6, 2020, United States Postal Inspector (USPI) Nathalie Saputa advised the rest of the team that based on a postal record search, USPS labels were created on October 5, 2020 for Priority Mail parcels 9505506683960279254993 and 9505506683960279255075 from Goodlettsville, TN to the mailbox designated to receive the steroids. On October 8, 2020, we retrieved two USPS parcels from USPI Saputa, which were found to contain 12 vials of deca (Deca Durabolin), 12 vials of test 400 (Testosterone) and 12 vials of sus 250 (Sustanon 250).

LLL Facebook Group Page

24. From March 2021 to October 2021, the CS provided several LLL online Facebook group page posts related to the sale of steroids.

25. For example, on August 2, 2021, Swanson, the user of Jeff Boyardee's Facebook page authored a Facebook post to the LLL online Facebook group page that read "HERE WE GO!!! Starting 8pm tonight through 8am Saturday. Order 2, gen one free of equal or lesser value on the following shirt sizes Test e shirt Test p shirt T 400 shirt Tren e shirt Sustanon shirt." Based on this Facebook post, I believe Swanson, while utilizing his own Facebook Moniker,

advertised an anabolic steroid sale. Swanson continues to use the code word “shirt” or “t-shirts” to promote his anabolic steroid business of Lay Low Labs.

26. On October 29, 2021, U.S. Magistrate Judge David D. Noce, signed a federal search warrant for information associated with Facebook user ID’s 319476455392042 (LLL online) and 100029291990326 (Jeff Boyardee).

Identification of “Panagiwths Zaxarioudakhs” as a Source of Supply

27. Examining the Facebook data received over “Jeff Boyardee’s” Facebook, agents believe Panagiwths Zaxarioudakhs is, and has been, acting as an illegal steroid source of supply to Jeffrey Swanson and Dave Underwood. It is believed Zaxarioudakhs is shipping illegal steroids from Greece into the United States based on the below conversations.

28. For example, on September 7, 2019, Jeff Boyardee sent the following Facebook message to Zaxarioudakhs asking the best way to correspond. Below is the communication between Jeff Boyardee and Zaxarioudakhs discussing the communication platform.

Author - Jeff Boyardee (Facebook: 100029291990326)
Sent 2019-09-07 13:54:07 UTC
Body This work better for you?

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)
Sent 2019-09-07 13:56:32 UTC
Body this or viber please

Author Jeff Boyardee (Facebook: 100029291990326)
Sent 2019-09-07 13:56:46 UTC
Body This please

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)
Sent 2019-09-07 13:59:03 UTC
Body deal

29. Based on this conversation, I believe Jeff Boyardee and Zaxarioudakhs agreed that Facebook messenger would be the best way to correspond regarding the distribution of illegal steroids.

30. On September 8, 2019, Zaxarioudakhs authored the following Facebook message to Jeff Boyardee (Swanson):

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 00:25:03 UTC

Body x5000 modafinil 200mg tabs

x40 10mg mt2 vials

x100 ambien tabs

x900 accutane 20mg tabs

x120 Lasix 40mg tabs

x500 xanax 4mg bars

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 00:25:07 UTC

Body calculating.....

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 01:10:53 UTC

Body x50 Boxes Modafinil.

50. x 24\$.:1200\$.-----x40 mt2.

40. x 8\$.:320\$.-----

Ambien (Zolpidem).

x100 - 10mg Tabs :24\$.-----x30 Boxes

Accutane.

30. x 13\$. :390\$.-----x10 Boxes Lasix

40mg.

10. x 3.40\$. : 34\$.-----x500 Xanax 4mg

Bars.

10 x 63\$: 630\$.-----Shipping Costs : 60\$

-----Total : 2658\$

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 01:10:58 UTC

Body wtf

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 01:10:59 UTC

Body wait

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 01:12:06 UTC

Body

x50 Boxes Modafinil.

50. x 24\$.:1200\$.

x40 mt2.

40. x 8\$.:320\$.

Ambien (Zolpidem).

x100 - 10mg Tabs :24\$.

x30 Boxes Accutane.

30. x 13\$. :390\$.

x10 Boxes Lasix 40mg.

10. x 3.40\$. : 34\$.

x500 Xanax 4mg Bars.

10 x 63\$: 630\$.

Shipping Costs : 60\$

Total : 2658\$

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 01:12:13 UTC

Body somehow better

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 01:12:16 UTC

Body double checking

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 01:13:28 UTC

Body seems correct to me.

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 01:38:58 UTC

Body 14xSshCZL638FFZtQ9Q8HupVhUbLXVKgNi

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 01:39:53 UTC

Body please send me payment(s) photos after sending funds over.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent

2019-09-08 23:17:38 UTC

Body Will do. Its sunday 6pm here right now so ill get it sent out tomorrow.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2019-09-08 23:20:43 UTC

Body Is there a particular app u recommend for bitcoin?

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 23:21:01 UTC

Body block chain

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2019-09-08 23:22:19 UTC

Body Okay. When im out the gym i will try to set that up to use instead of western union

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 23:22:47 UTC

Body western union and these prices is a penta no go.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2019-09-08 23:27:05 UTC

Body Ive sent larger sums through WU but if youre not comfortable with that then we will do it another way. No problem ..

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-08 23:27:39 UTC

Body sorry pal BTC for me only.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2019-09-08 23:40:52 UTC

Body No problem. I just need to set it up is all

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-11 00:30:29 UTC

Body Everything alright mate

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2019-09-11 00:50:15 UTC

Body Yep. I couldnt get blockchain to work so i had to get coinbase. Bought some but theres a few day hold on it unless im transferring to someone else using coinbase

Author Jeff Boyardee (Facebook: 100029291990326)
Sent 2019-09-11 00:51:41 UTC
Body You sent a photo.
Attachments image-314863162657176 (314863162657176)
Type image/jpeg
Size 22924
URL https://interncache-eag.fbcdn.net/v/t1.15752-9/69872344_314863185990507_284127831980507136_n.jpg?ccb=1-5&_nc_sid=73a6a0&efg=eyJ1cmxnZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9pbW9nZW46RFlJTWVkaWFVdGlscyJ9&_nc_ad=z-m&_nc_cid=0&_nc_ht=interncache-eag&oh=03_AVKaVCdk6GLOx4mdpY-WgD7AMN6YhL0qaq9MF_zZyi55WA&oe=61E64233

Author Jeff Boyardee (Facebook: 100029291990326)
Sent 2019-09-11 15:41:40 UTC
Body Got it all figured out. Money is on hold for 5 more days then i can transfer. Am i able to add on to that order?

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)
Sent 2019-09-11 15:45:05 UTC
Body sur

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)
Sent 2019-09-11 15:45:07 UTC
Body sure****

Author Jeff Boyardee (Facebook: 100029291990326)
Sent 2019-09-11 15:58:53 UTC
Body 15-100iu kits of hygetropin

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)
Sent 2019-09-11 16:00:28 UTC
Body reply will take a while sorry packing

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)
Sent 2019-09-12 23:58:16 UTC
Body havent forgot you

Author Jeff Boyardee (Facebook: 100029291990326)
Sent 2019-09-13 00:06:49 UTC
Body Same here bro. Im not sure if this delay is a 1st time thing or its everytime but ill make sure i dont hold u up like this with farther

orders

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-13 00:07:06 UTC

Body its always like this sadly

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-13 00:07:11 UTC

Body unless you get paid with it

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-13 00:07:21 UTC

Body i dont mind wait

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2019-09-13 00:07:30 UTC

Body No. I havent dabbled with it much.

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2019-09-13 00:07:33 UTC

Body as long as the buyer is serious i can wait an eternity

31. Based on this conversation, I believe this correspondence is an illegal anabolic steroid list ordered by Jeff Boyardee.

32. I and my team believe both Zaxarioudakhs and Jeff Boyardee (Swanson) know what they are doing is illegal. For instance, Zaxarioudakhs informed Swanson on what not to do in order for the IRS not to investigate. Zaxarioudakhs specifically stated "For safety I stop at 900\$" and "be sure my receiver won't reach 15K\$ total in electronic payments during 2019." Zaxarioudakhs told Jeff Boyardee that someone told him that global Interpol was starting a global operation and it would last for one week. He alluded to the fact that packages would be opened and was giving Jeff Boyardee a "heads up." Zaxarioudakhs told Jeff Boyardee, "You are a good lad I don't want you get fucked." Jeff Boyardee told Zaxarioudakhs, "My oil raws I get domestic." Jeff Boyardee thanked Zaxarioudakhs for the information and stated he would

let his reps know not to buy anything independently during that time period. Zaxarioudakhs replied, “unity of people can take down any system.”

33. On January 7, 2020, Zaxarioudakhs corresponded that because of a China ban it was hard to get product and that he almost got arrested on 1/1/2020. Jeff Boyardee stated “labs” (places where anabolic steroids are produced in liquid or pill form for consumption) in the U.S. were already shutting down. Jeff Boyardee stated how much he liked Zaxarioudakhs, Jeff Boyardee corresponded, “I’m not going anywhere man. As long as I keep my lab open, I’ll continue to buy product through you. Loyalty is huge to me in this. U came highly recommended and as long as the product is good then we will continue to do business going forward.” Zaxarioudakhs informed Jeff Boyardee the package was on its way and it will arrive in five days. Zaxarioudakhs bragged that he sends 100+ packages a week.

34. On February 5, 2020, Jeff Boyardee stated the following: “Mt2, Lasix and Accutane all came in today. Ambien, gh and xan bars all came in previously. Only thing left is 5000 tabs of the 200mg modafinil”. Zaxarioudakhs blamed the delay on the coronavirus and slow shipping with China. I believe Boyardee confirmed he received Xanax bars, growth hormones, Mt2 (Tramadol Hydrochloride), Lasix and Accutane from Zaxarioudakhs.

35. On February 28, 2020, Jeff Boyardee placed an order for “20 kits of gh” through Zaxarioudakhs’ Facebook page. Zaxarioudakhs acknowledged he can place that order and the total is \$2,000.00.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-02-28 13:47:26 UTC

Body I’d like to order 20kits of gh if possible

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-02-28 13:47:32 UTC

Body doable.

Author

Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-02-28 13:47:43 UTC

Body availability : instant.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-02-28 13:47:48 UTC

Body Cool. Let me know how much and I'll send money today

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-02-28 13:47:55 UTC

Body yes sir.

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-02-28 13:48:01 UTC

Body later tonight consider it done.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-02-28 13:48:15 UTC

Body Thank you man. No rush

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-02-28 13:48:21 UTC

Body you are welcome sir.

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-06 00:28:32 UTC

Body if iam not wrong you wanted x20 kits gh.

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-06 00:28:45 UTC

Body thing is you did not texted me twice atleast and i forgot it.....

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-06 00:31:04 UTC

Body All good bro

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-06 00:31:12 UTC

Body Yes I'd like to order 20kits if possible

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-06 00:32:20 UTC

Body give me a a momment and i will deal with it immediately.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-06 00:33:19 UTC

Body You: ..

Attachments sticker (369239263222822)

Type image/png

Size

URL https://interncache-eag.fbcdn.net/v/t39.1997-6/39178562_1505197616293642_5411344281094848512_n.png?ccb=1-5&_nc_sid=0572db&efg=eyJ1cmxnZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9lbnRpdHkvc3RpY2tlenMifQ%3D%3D&_nc_ad=zm&_nc_cid=0&_nc_ht=interncache-eag&oh=00_AT-gaPpc2XxYSSQ4Ddbh9T5OfYypHbEwqGV4j5JSuLNUPA&oe=61C4C24B

Author Panagiwth's Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-08 15:05:17 UTC

Body 100\$ x 20 = 2000\$

Author Panagiwth's Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-08 15:05:29 UTC

Body 16XFT39wA7ohqQvEPNuQDVJGZ7Bn8Sf3LS

Author Panagiwth's Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-08 15:05:40 UTC

Body to rebuild lost trust if you are fast enough i will ship tommorow.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-08 16:24:49 UTC

Body My man

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-08 16:24:52 UTC

Body Ill send money rn

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-08 16:26:48 UTC

Body Sent

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-08 16:26:53 UTC

Body First one the value changed

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-08 16:27:07 UTC

Body So i sent another 20 to cover it

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-08 20:09:47 UTC

Body did not truly understand.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-08 20:10:31 UTC

Body First one was only 1984.45

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-08 20:10:38 UTC

Body lol

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-08 20:10:40 UTC

Body dont bother.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-08 20:10:41 UTC

Body So i sent another \$20

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-08 20:10:50 UTC

Body Already done

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-08 20:10:54 UTC

Body I appreciate you

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-08 20:10:57 UTC

Body lol

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-08 20:11:03 UTC

Body adress and iam ready to pack.

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-08 20:11:08 UTC

Body 1st package of the night.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-08 20:22:46 UTC

Body Jeff

Po box 3659

Clarksville TN 37043

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-08 20:27:29 UTC

Body Jeff i think thats too short.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-08 22:45:19 UTC

Body What do you mean

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-08 22:57:00 UTC

Body that sirname is missing.

Author Jeff Boyardee (Facebook: 100029291990326)

Sent 2020-03-09 00:27:16 UTC

Body Jeff Swanson

Po box 3659

Clarksville TN 37043

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)

Sent 2020-03-09 00:27:45 UTC

Body thanks

36. At this time, Swanson was residing in Tennessee and agents had identified the address PO Box 3659, Clarksville, TN 37043, as one of Swanson's addresses he used to further his drug trafficking activities.

37. On May 28, 2020, Jeff Boyardee placed an order with Zaxarioudakhs for the following:

5 Balkan Tren Hex - \$275

10 Ment - \$550

10 RIP Blend - \$450

10 Lasix - \$200

10 Mt2 - 180

30 5mg Finasteride - \$750

Total \$2405 + Shipping

Subtract \$1200 Credit

New total \$1205 + shipping.

38. On May 13, 2021, Zaxarioudakhs asked Jeff Boyardee where to send “60 Mt2” that was ordered. Jeff Boyardee stated the following: “Send it directly to me. Dave 503 W 2nd Ave Monmouth IL 61462”. Zaxarioudakhs asked for the full name for the package, Jeff Boyardee responded: “Dave Underwood.”

39. On August 10, 2021, the following conversation took place between Zaxarioudakhs and Jeff Boyardee:

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)
Sent 2021-08-10 05:39:05 UTC
Body did you received it after all ?

Author Jeff Boyardee (Facebook: 100029291990326)
Sent 2021-08-10 09:42:43 UTC
Body No

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)
Sent 2021-08-10 09:42:59 UTC
Body refund.

Author Jeff Boyardee (Facebook: 100029291990326)
Sent 2021-08-10 09:43:18 UTC
Body You're call. I get it,. Not your fault

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)
Sent 2021-08-10 09:43:35 UTC
Body can i have a new adress please ?

Author Jeff Boyardee (Facebook: 100029291990326)
Sent 2021-08-10 09:44:48 UTC
Body Let me get.you one. I'll send it later. I'm in my shop.

Author Panagiwths Zaxarioudakhs (Facebook: 100001557613612)
Sent 2021-08-10 09:45:19 UTC
Body ok.

40. Based on this conversation, your affiant believes Swanson did not receive the illegal steroid and Zaxarioudakhs was attempting to refund Swanson.

41. Based on the information described above, I believe Zaxariouisdakhs used his Facebook profile to communicate, advertise, promote and acquire customers to distribute illegal anabolic steroids.

42. Additionally, information stored in the Facebook accounts listed herein, may provide crucial evidence of the “who, what, why, when, where, and how” of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion.

43. On January 4, 2022, DEA SA Julie Olmsted made a preservation request for Panagiwths Zaxariouisdakhs Facebook Profile (Facebook Profile ID: 100001557613612). Your affiant believes Facebook has the records being requested due to the ongoing criminal activity obtained through the prior Facebook data of Swanson and LLL online.

BACKGROUND ON FACEBOOK

44. Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

45. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user’s full name, birth date, gender, contact e-mail addresses, Facebook passwords, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

46. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a “Friend Request.” If the recipient of a “Friend Request” accepts the request, then the two users will become “Friends” for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user’s account includes a list of that user’s “Friends” and a “News Feed,” which highlights information about the user’s “Friends,” such as profile changes, upcoming events, and birthdays.

47. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create “lists” of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

48. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post “status” updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming “events,” such as social occasions, by listing the event’s time, location, host, and guest list. In addition, Facebook users can “check in” to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user’s profile page also includes a “Wall,” which is a space where the user

and his or her “Friends” can post messages, attachments, and links that will typically be visible to anyone who can view the user’s profile.

49. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo or video. It also provides users the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook’s purposes, the photos and videos associated with a user’s account will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.

50. Facebook users can exchange private messages on Facebook with other users. Those messages are stored by Facebook unless deleted by the user. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a chat feature that allows users to send and receive instant messages through Facebook Messenger. These chat communications are stored in the chat history for the account. Facebook also has Video and Voice Calling features, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

51. If a Facebook user does not want to interact with another user on Facebook, the first user can “block” the second user from seeing his or her account.

52. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as webpages or content on third-party (i.e., non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.

53. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

54. Each Facebook account has an activity log, which is a list of the user's posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as "liking" a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user's Facebook page.

55. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

56. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications ("apps") on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user's access or use of that application may appear on the user's profile page.

57. Facebook also retains Internet Protocol ("IP") logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user's IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

58. Social networking providers like Facebook typically retain additional information about their users' accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may

communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

59. As explained herein, information stored in connection with a Facebook account may provide crucial evidence of the “who, what, why, when, where, and how” of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a Facebook user's IP log, stored electronic communications, and other data retained by Facebook, can indicate who has used or controlled the Facebook account. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time. Further, Facebook account activity can show how and when the account was accessed or used. For example, as described herein, Facebook logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events relating to the crime under investigation. Additionally, Facebook builds geo-location into some of its services. Geo-location allows, for example, users to “tag” their location

in posts and Facebook “friends” to locate each other. This geographic and timeline information may tend to either inculcate or exculpate the Facebook account owner. Last, Facebook account activity may provide relevant insight into the Facebook account owner’s state of mind as it relates to the offense under investigation. For example, information on the Facebook account may indicate the owner’s motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

60. Therefore, the computers of Facebook are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

61. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Facebook to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

CONCLUSION

62. Based on the forgoing, I request that the Court issue the proposed search warrant.

63. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) &

(c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

64. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

REQUEST FOR SEALING

65. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.

I state under the penalty of perjury that the foregoing is true and correct.

Angela Candler-Bruno

Angela Candler-Bruno
Task Force Officer (TFO)
Drug Enforcement Administration

Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41 this 24th day of February, 2022.



JOHN M. BODENHAUSEN
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the Facebook user ID, **100001557613612** that is stored at premises owned, maintained, controlled, or operated by Facebook Inc., a company headquartered in Menlo Park, California.

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Facebook

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook Inc. (“Facebook”), including any messages via Facebook Messenger, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each user ID listed in Attachment A:

- (a) All contact and personal identifying information, including: full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers., group identification number, a list of users currently registered to the group, and Group Contact Info, including all contact information for the creator and/or administrator of the group and a PDF of the current status of the group profile page.
- (b) All activity logs for the account and all other documents showing the user’s posts and other Facebook activities;
- (c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them, including Exchangeable Image File (“EXIF”) data and any other metadata associated with those photos and videos,

- (d) All profile information; News Feed information; status updates; videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications;
- (e) All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending "Friend" requests;
- (f) All "check ins" and other location information;
- (g) All Facebook Messenger content information;
- (h) All IP logs, including all records of the IP addresses that logged into the account;
- (i) All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook webpages and content that the user has "liked";
- (j) All information about the Facebook pages that the account is or was a "fan" of;
- (k) All past and present lists of friends created by the account;
- (l) All records of Facebook searches performed by the account;
- (m) All information about the user's access and use of Facebook Marketplace;
- (n) The types of service utilized by the user;
- (o) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);

- (p) All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;
- (q) All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846, involving Panagiwths Zaxarioudakhs (Profile ID: **100001557613612**) from January 1, 2019 to present including for each Facebook user Profile ID identified on Attachment A, information pertaining to the following matters:

- (a) Evidence indicating communication before and after the narcotics transactions between Swanson and Moore and any other co-conspirators involved in the distribution of illegal drugs.
- (b) Evidence indicating the transfer of narcotic between Swanson and Moore and any other co-conspirators involved in the distribution of illegal drugs.
- (c) Evidence indicating the cost and amount of narcotics transferred between Swanson and Moore and any other co-conspirators involved in the distribution of illegal drugs.
- (d) Evidence indicating how and when the Facebook account was accessed or used, to determine the chronological and geographic context of account access, use, and

events relating to the crime under investigation and to the Facebook account owner;

- (e) Evidence indicating the Facebook account owner's state of mind as it relates to the crime under investigation;
- (f) The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s).